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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

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11
12 UNITED STATES OF AMERICA,
13 Plaintiff,

14 vs.

15 ALBERT LAFARGA-CRUZ,
16 Defendant.

Case No.: 2:13-cr-00085-APG-PAL

**MOTION TO REQUEST PRE-TRIAL
SERVICES INTERVIEW ALBERT
LAFARGA-CRUZ WITH PROPOSED
ORDER**

(Expedited Treatment Requested)

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18 COMES NOW the defendant, Albert Lafarga-Cruz, by and through his counsel of
19 record, Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant Federal Public
20 Defender, counsel for defendant and files this Motion to Request Pre-trial Services to Interview Mr.
21 Lafarga-Cruz for the following reasons.

22 DATED this 14th day of May, 2013.

23 RENE L. VALLADARES
24 Federal Public Defender

25 /s/ Monique Kirtley

26 MONIQUE KIRTLEY
27 Assistant Federal Public Defender
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1 **MOTION TO REQUEST PRE-TRIAL SERVICES INTERVIEW**
2 **ALBERT LAFARGA CRUZ**

3 On April 27, 2013, the defendant, Albert Lafarga-Cruz (“Lafarga”), made an initial
4 appearance before Magistrate Judge Cam Ferenbach. Mr. Lafarga was detained as a flight risk and
5 a danger to the community. It appears from the Order that the Court did not have any verifiable
6 information regarding Mr. Lafarga as he had not interviewed with Pre-trial Services. The
7 undersigned counsel filed a Motion to Re-Open Bail. A hearing on the Motion is scheduled for May
8 21, 2013 at 10:00 a.m. Prior to the hearing, Mr. Lafarga would like the opportunity to be interviewed
9 by Pre-trial Services. In order to have Mr. Lafarga interviewed, the undersigned respectfully requests
10 that this Court order Pre-trial Services to interview him prior to the 10:00 a.m., on May 21, 2013.
11 Undersigned counsel is including a proposed order that would accomplish what is being requested
12 in this motion.

13 DATED this 14th day of May, 2013.

14 Respectfully submitted,

15 RENE L. VALLADARES
16 Federal Public Defender

17 /s/ Monique Kirtley

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19 MONIQUE KIRTLEY
20 Assistant Federal Public Defender
21 Counsel for Albert Lafarga-Cruz
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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 * * *

4 UNITED STATES OF AMERICA,

Case No.: 2:13-cr-00085-APG-PAL

5 Plaintiff,

ORDER

6 vs.

7 ALBERT LAFARGA CRUZ,

8 Defendant.

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10 The reasons being sound and in the best interests of justice and judicial economy
11 being served. if time and resources are available

12 IT IS ORDERED that Pre-trial Services[↑] conduct a pre-trial interview ~~on May 21,~~
13 ~~2013 prior to 10:00 a.m.~~ and the court on or before May 20, 2013.
~~and make the report available to the parties as quickly as possible.~~[↑]

14 DATED this 15th day of May, 2013.

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17 UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Law Offices of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on May 14, 2013, she served an electronic copy of the above and foregoing **MOTION TO REQUEST PRE-TRIAL SERVICES INTERVIEW ALBERT LAFARGA CRUZ WITH PROPOSED ORDER**, (Expedited Treatment Requested), by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
SUSAN CUSHMAN
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/s/ Blanca Lenzi

Employee of the Federal Public Defender